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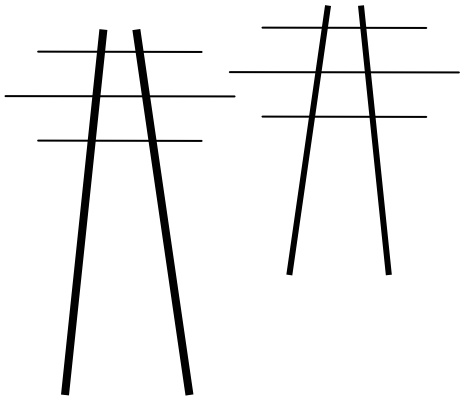

August 14, 2009

Bill Storm, Project Manager
Minnesota Dept. of Commerce
85 – 7th Place East, Suite 500
St. Paul, MN 55101-2198

Via email: bill.storm@state.mn.us

RE: Nashwauk PUC HVTL Permit Application – EIS Scoping Comments
PUC Docket No.: E280/TL-09-512

Dear Mr. Storm:

Thank you for the opportunity to raise comments regarding the scope of the Nashwauk PUC Permit Application EIS. I am making these Comments not in the course of representing any party, but as an individual who has represented many on

I. The EIS must address impacts of the infrastructure for the entire Essar project, cumulatively.

The Nashwauk HVTL project, as proposed, is a part of a much larger project, the Essar steel mill, and the EIS must consider the cumulative impacts of all the infrastructure proposed, including, but not limited to, the transmission line, the gas pipeline, the railroad, and any water pipelines.

II. The EIS must address impacts of the HVTL as an addition to pre-existing infrastructure.

The Nashwauk HVTL project is proposed for an area where there is already existing infrastructure. The EIS must consider the impacts of adding more infrastructure to an area that already has some infrastructure.

III. Minnesota Dept. of Commerce should complete a joint EIS with federal agencies working on the Essar Steel EIS.

Minnesota Rule 4410.3900 anticipates coordinating state and federal review where possible. Because the Essar Steel EIS has been delayed, this HVTL EIS should be done jointly with this EIS.

IV. Impacts on wetlands will occur if this project goes forward, and the EIS must identify, address and propose mitigation.

The planned and alternative routes for the transmission line would traverse wetlands and the EIS must identify, address and propose mitigation.

V. The EIS must address the impacts of air and water emissions that will be facilitated by transmission to power the Essar plant (phased and connected actions).

As a integral part of the Essar project, this EIS must address the impact of air and water emissions that will be facilitated by transmission of power for the Essar plant as a phased and connected action.

VI. The EIS must address electrical additions and upgrades necessary if this project is built (phased and connected actions).

The Essar plant will alter the electrical patterns in the area, perhaps the region, and the EIS must take into account the MISO interconnection studies regarding necessary additions and upgrades, including the environmental impacts and the cost for the cost/benefit analysis, i.e., Boswell and Blackberry transmission lines.

VII. The EIS must address socio-economic impacts.

The EIS must address socio-economic impacts to sufficiently inform the records for a cost/benefit. As to specific socio-economic impacts and displacement of residents, the EIS must address the impact of Buy the Farm on this project, including the percentage of residents expected to take advantage of Buy the Farm, the cost increases expected, the level of human displacement through Buy the Farm, etc. The EIS must also consider impacts of this transmission on enjoyment and use of land, agriculture practices, foresting, recreation, etc. The EIS must also address the impact of this transmission project on Nashwauk ratepayers, and whether this will be paid for by Essar or by ratepayers or other rate schemes. The socioeconomic impacts addressed must also include a full accounting for public monies expended from any and all sources, for both the Essar project which this line enables, and for this specific project. The EIS must also include a copy of and consider the PPA for the electric that will flow over these lines, and and

VIII. The EIS must address the impacts of various substation locations.

The project proposes new substations for both the Essar Mine and the Essar Steel Plant. The EIS must address the impacts of locating these substations at the preferred and alternate sites.

IX. The EIS must address impacts of the dedicated source generation for this project

The EIS must address impacts of the dedicated electrical generation, but for which this project would not be built. If the source of the electricity is coal, then the incremental increase in emissions impacts must be addressed.

X. The EIS must address PEER's existing corridor preference.

Minnesota's PEER decision holds that existing corridors must be used unless there is a compelling reason not to. This project is proposed near existing corridors but does not use it, and the EIS must address reasons why the existing corridor is not used, sufficient to address compliance with PEER. Specifically, the use of existing transmission, pipeline and railroad corridor must be address.

XI. The EIS must consider route alternatives.

The Draft EIS scope states that OES EFP staff is not recommending any additional routes, other than those presented. To the extent that the public or the Task Force presents alternate routes, these must be considered.

XII. The EIS must consider system alternatives.

The EIS must consider alternatives of energy conservation, load-management, alternatives fo rsatisfying the energy demand or transmission needs. The EIS must also consider the specification of the line and various configurations – if it is presumed to be for Essar, then the configuration of the line could be a range of combinations of voltage and size and type (ACSR/ACSS) and use of these should be considered for cost, impact and future use.

XIII. The EIS must address the impact on property values.

The EIS must address property values, including compensation of affected landowners near, but not under the lines, for property devaluation and other costs. Landowners face property valuation costs such as loss of value and credit-worthiness from the day the project is announced, in addition to valuation losses in sales or decreased value in assessments which have an impact on local governments.

XIV. The EIS must include review and comments from state and federal agencies.

The EIS must include consultation, review and comments of state and federal agencies, i.e., DOT regarding crossings of Hwy. 65 and use of right-of-way, U.S. Army Corps. of Engineers regarding wetlands, DNR regarding wildlife. The DOT's accommodation policy should be addressed and the policy itself included as an exhibit.

XV. The EIS must address impacts of transmission structures.

The EIS must address impacts of transmission structures, including, but not limited to, impacts of digging foundations in sensitive areas, impacts of concrete and concrete leachate on surface and ground waters, impact of penta poles on surface and ground waters, etc.

XVI. The EIS must address impacts of EMF, including high frequency EMF.

The transmission line, as proposed, will traverse residential areas, and it must address EMF impacts on those residents, specifically identifying a range of EMF levels based on a range of potential current levels of the line. The EIS must address impacts of EMF, specifically including high frequency EMF testing and modeling. EMF modeling and testing is too often only tested at 60hz. Higher frequencies, particularly very high frequencies, must be modeled, monitored and tested For more info: www.powerlinefacts.com

XVII. The EIS must address impacts of noice, particularly low frequency substation noise.

Noise of substations is particularly annoying, and low frequencies, below state of Minnesota standards, can be heard for long distances. Low frequency noises should be modeled and level should be taken at other similar substations for baseline purposes using dB(a), dB(c) and dB(g) scales. The EIS must also address various means of mitigation, including walls and trees.

XVIII. The EIS must address impacts of substation lighting.

The EIS must consider the impacts of substation lighting. Lately new substations look more like intergallactic space stations than electric substations, visible for many miles. The impact of various levels of lighting, downward lighting, and dark-skies options must be addressed.

Thank you for the opportuity to submit these comments.

Very truly yours,

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